



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
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February 26, 2020

Via ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: SEC v. Telegram Group Inc. & TON Issuer Inc., No. 19 Civ. 9439 (PKC)

Dear Judge Castel:

Plaintiff Securities and Exchange Commission ("SEC") respectfully hereby files certain Exhibits to the Declaration of Ladan F. Stewart in Support of the SEC's Motion for Summary Judgment (D.E. 122) ("Stewart Decl.") and the Declaration of Ladan F. Stewart in Opposition to Defendants' Motion for Summary Judgment (D.E. 123). As the SEC explained in its cover letter accompanying these filings (D.E. 82, 100), the SEC did not file certain exhibits in the public docket, because those exhibits had been designated "Confidential" by the producing party pursuant to the standing Protective Order (D.E. 36) (the "Withheld Documents"). Since those filings, certain third parties (D.E. 105, 135, 138, 139, 142, 143, 148, 152, and 157) and Defendants (D.E. 158) have moved to seal all or portions of some of the Withheld Documents.

After these filings, only PX42, PX50, PX56, PX59, PX91, PX103, PX104, and PX146 have not been the subject of a motion to seal and have not been filed in the public docket in any form. Accordingly, the SEC is filing those exhibits on the public docket today. The SEC is also filing on the public docket a corrected copy of PX15, which was previously filed at D.E. 122-15 (missing page 00000573) and D.E. 144-1 (currently sealed). Where relevant, the SEC is also filing its proposed redactions to PX15, PX59, PX91 and PX146, in accordance with the Southern District of New York's procedures for filing proposed redacted documents.

Additionally, the SEC moved to temporarily seal the Application for a Letter of Request (D.E. 43), as well as several exhibits to the Declaration of Kevin McGrath (D.E. 124-7, 124-13, 124-14), based on investors' concerns with respect to certain redactions of personal identifying information. The SEC is refileing those documents with proposed redactions of personal identifying information today.

Hon. P. Kevin Castel
Page 2

February 26, 2020

Respectfully submitted,

s/ Alison R. Levine
Alison R. Levine

Encls.

cc: All Counsel of Record (by ECF)